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October 5, 2001

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37201

> In Re: Joint Petition of Crockett Telephone, Inc., People's Telephone Company, West Tennessee Telephone Company, Inc. and the Consumer Advocate Division of the Office of the Attorney General for the Approval and Implementation of Earnings Review Settlement Docket No. 99-00995

REVISION OF AT&T'S DISCOVERY REOUESTS TO THE TEC COMPANIES BASED ON RULINGS AT PRE-HEARING CONFERENCE

Dear Mr. Waddell:

In accordance with Mr. Collier's rulings at the Pre-Hearing Conference held on Thursday, October 4, 2001, AT&T Communications of the South Central States, Inc. ("AT&T") hereby revises its First Set of Discovery Requests to the TEC Companies that was served and filed on March 23, 2000, as follows:

- In the proposed settlement agreement between the TEC Companies and the CAD, it is proposed to give a monthly credit in 2000 and 2001 of "\$5.00 per business access line" and of "\$4.75 per residence access line."
- Do the terms "business access line" and "residence access line" that are used in the settlement agreement refer to tariffed services that use the same terms?
- For each TEC Company, identify the current tariff pages or section of the tariff that covers the services referred to in the settlement agreement as "business access line" and "residence access line."
 - Withdrawn. c.

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- d. Under the proposed settlement, are the current rates for "business access lines" and "residence access lines" assumed to remain unchanged through the life of the agreement?
- e., f. & g. Have the rates for "business access lines" or "residence access lines" for any TEC Company increased since 1984? If the answer is affirmative for any company, please identify which company.
 - h., i., j. & k. Unchanged.
 - 2. Unchanged.
 - 3. Unchanged.
 - 4. Withdrawn.
 - 5. Withdrawn.
 - 6. Objection sustained.
 - 7. Objection sustained -- deferred to hearing.
 - 8. a. Withdrawn
- b. Please identify the subsidiaries of Telephone Electronics Corporation that operate in Tennessee.
 - c. Unchanged.

Enclosed the are original and thirteen copies of this letter revising AT&T's discovery requests. This letter is also being served on counsel for all parties by facsimile or e-mail, as directed by Mr. Collier.

west by

ck W. Robinson, Jr.

JWR/ghc Enclosures

cc: Richard Collier
R. Dale Grimes and T. G. Pappas
Timothy C. Phillips
Gene V. Coker
Garry Sharp